Bill.

OAQPS and OECA co-wrote guidance to assist EPA's Regional offices in determining when it is appropriate to reference or incorporate information from the 2018 Reclassification Memorandum into either the analysis supporting an Applicability Determination (AD) request or the AD itself. Use of the guidance will ensure consistency and legal accuracy across EPA in preparing MACT applicability determination responses referencing the 2018 Reclassification Memorandum. OECA has requested the guidance be co-signed at the AA level by both OAR and OECA. The guidance has been reviewed by OGC (Scott Jordan, Sonja Rodman) and is attached for signature.

Thanks, and feel free to call me if you want to discuss or would like more information.

David A. Cozzie (919-541-5356)

Acting Director, Sector Policies and Programs Division